

Exhibit P

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

**CORR WIRELESS
COMMUNICATIONS, L.L.C.,
CELLULAR SOUTH, INC., and
CELLULAR SOUTH LICENSES, LLC**

PLAINTIFFS

V.

CIVIL ACTION NO. 3:12CV036

**AT&T, INC., AT&T MOBILITY LLC,
MOTOROLA SOLUTIONS, INC.,
MOTOROLA MOBILITY,
QUALCOMM INCORPORATED, and
JOHN DOES 1-10**

DEFENDANTS

**SECOND DECLARATION OF L. F. SAMS, JR. IN SUPPORT OF
DEFENDANT QUALCOMM INCORPORATED'S MOTION TO DISMISS
PLAINTIFFS' COMPLAINT**

I, L. F. SAMS, JR., hereby declare as follows:

1. I am a member of the bar of this Court and practice with the firm of Mitchell McNutt & Sams, P.A., which represents Defendant Qualcomm Incorporated ("Qualcomm") in the above-captioned action as co-counsel with Cravath, Swaine & Moore LLP. I submit this declaration in support of Qualcomm's Motion to Dismiss ("Motion").
2. Attached to the Reply Memorandum of Law In Support of Defendant Qualcomm Incorporated's Motion to Dismiss Plaintiffs' Complaint ("Reply") as Exhibit L is a true and correct copy of an Ex Parte Letter from Verizon to Rick Kaplan, Chief, Wireless Telecommunications Bureau, submitted in the matter of *Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo, LLC for Consent to Assign Licenses and Application of Cellco Partnership d/b/a Verizon Wireless*

and Cox TMI Wireless, LLC for Consent to Assign Licenses, WT Docket No. 12-4, dated May 22, 2012. All redactions are in the original document.

3. Attached to the Reply as Exhibit M is a true and correct copy of “Comments of Qualcomm Incorporated” submitted to the FCC in the matter of *Promoting Interoperability in the 700 MHz Commercial Spectrum*, WT Docket No. 12-69, dated June 1, 2012.

4. Attached to the Reply as Exhibit N is a true and correct copy of a press release issued by U.S. Cellular, entitled “U.S. Cellular Customers Getting the Samsung Galaxy S III in July”, dated June 4, 2012, available at <http://www.uscellular.com/about/press-room/2012/USCELLULAR-CUSTOMERS-GETTING-THE-SAMSUNG-GALAXY-S-III-IN-JULY.html>.

5. Attached to the Reply as Exhibit O is a true and correct copy of *Analysis of Interference to LTE Cellular Base Stations From Adjacent Channel Digital Television System WWJX, Jackson, MS*, prepared by Charles F. Ellis, PE, dated Dec. 24, 2010, attached to the Supplement to Petition for Rulemaking of George S. Flinn, Jr., RM-11618 (Dec. 29, 2010).

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 27, 2012.

/s/ L.F. Sams, Jr.
L. F. Sams, Jr.